

Grant Monitoring and Oversight

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Objectives and Topics

- By the end of this presentation, you should be able to successfully:
 - List the key elements of the grant reporting and oversight process
 - Grant Reporting and Oversight Overview
 - Annual Risk Assessment
 - Monitoring Plan



Purpose of Grant Reporting and Oversight

- **Improve the overall management of projects to enhance their performance towards achieving the Agency's safety mission**
- Ensure that the terms and conditions, and purpose of the awards are fulfilled
- Assure that grant activities are those that were approved and are consistent with federal law, standards and procedures
- Protect the federal financial investment from fraud, waste, abuse or mismanagement
- Ensure grantees conduct monitoring and oversight of their sub-recipients and subcontractors.



Grant Reporting and Oversight Roles

- The Grant Manager (DA) holds the primary grant reporting and oversight responsibility; however, this is in coordination with the GMO, Service Center State Program Manager (SPM) and HQ Program Managers(PO)
- The Grantee's Grant Manager has the responsibility to develop a monitoring plan to ensure the projects approved in the grant application are successful



Grantee Oversight Requirements

- Required to have the infrastructure and internal controls to ensure program implementation and administrative and fiscal compliance (e.g. monitoring plan, vouchering process)
- Responsible for ensuring that funds are used in accordance with the FMCSA provisions and assurances, program requirements, and federal cost principles
- **Grantee is ultimately responsible for the use of the grant funds – including those awarded to sub-grantee (2CFR 200.331 and .302)**



Core Elements of FMCSA Oversight

- **Annual Risk Assessment** - a standardized method of assessing and prioritizing grantees within a given state and program portfolio for on-site monitoring (used by FMCSA and may be used by Grantees with multiple subgrantees)
- **Monitoring Plan** – articulates the Grant Manager's strategy for the monitoring of their grant projects (FMCSA and Grantee)
- **Basic Mandatory Monitoring** – activities that are done on a regular basis in order to determine that the grant projects are being managed appropriately, includes: reviewing quarterly reports, annual single audit reports, other audit feedback, data submissions, vouchers and regular communications



Core Elements of FMCSA Oversight

- **On-Site Monitoring** – any monitoring activities that are conducted at a location other than your office and are formally recorded in a memo to file. This can include a series of checks on projects (e.g. IT systems install or programming, inspection procedures, compliance investigations), financial files, inventory, etc. (FMCSA and Grantee)
- **FMCSA tools to use** –
 - A&I MCSAP – Quarterly Report Data Dashboard, State Safety Performance Measures, State Data Summary
 - A&I Data Quality – State Safety Data Quality, FARS/MCMIS Matching Tool, State Data Analysis Reports, DataQ
 - SafetyNet Reports
 - MCMIS for New Entrant



FMCSA On-Site Monitoring Plan

- Grant Manager develops plan for their state . Plan includes:
 - One On-Site Monitoring Plan
 - Use Annual Risk Assessment as guide
 - List by grantee and then by program
 - Plan covers current year, and projection for years 2 and 3 (a rolling plan, FY16-18, then FY17-19)
 - Minimum - one on-site visit every three years
 - Includes all Program Assessments performed by contractors and/or HQ staff as well



Grantee Monitoring Plan

- Grantee Grants Manager develops plan for their grant .
Plan includes:
 - Plan covers period of performance
 - Includes all Project elements:
 - Project coordination
 - Milestones
 - Contracting
 - Reporting – Programmatic and Financial
 - Vouchering
 - On-Site Monitoring Plan



Resources Used in Risk Monitoring

- Single Audits (performed by State or Accounting firms)
- Quarterly Performance Program Reports (PPRs)
- Quarterly Federal Financial Reporting (SF -425: FFR)
- Invoicing (SF 270)
- Amendment Requests (FMCSA Template)
- Internal control Audits
- OIG Audits (federal or state)



Single Audits Grantee Responsibility

- Most Grantee's will have Annually
- FMCSA Grants may or may not be included in Sample by Auditors
- Threshold \$750,000 federal funds expended in Fiscal Year
- Subgrantee's use the same threshold (\$750,000 Federal Funds received by the subgrantee)
- Review results if FMCSA grants are in Sample or if your Agency is in the Sample



Monitoring - Quarterly Reporting

- **PPR (Sources: Grants Manual, 2 CFR 200.328, NGA General Provisions #20.a.)**
 - Must report on Progress of the Project(s) award
 - Must reflect status of progress being made for the objectives, activities, and milestones
 - Must include challenges faced on progress whether it's meeting objectives or getting unexpected results of the activities or not meeting timelines
 - Legislative issues.. Not moving forward
 - Contracting issues with RFP
 - Activity wasn't as effective as intended, so changing it and why
 - Content reviewed by Grantee and FMCSA Grant Managers to ensure that the project(s) is on target, if major changes are being proposed, if timelines are being met, if activities are being completed or changed and if grantee program management staff is changing
 - Timely and complete: at least quarterly, due 30 days after the end of the quarter



Monitoring - Quarterly Reporting

- **FFR (Sources: Grants Manual, 2 CFR 200.327, NGA General Provision #20.b.)**
 - Verified against PPR and SF -270 invoices,
 - Reviews the Unliquidated federal funds (incurred not received/invoiced yet)
 - Timely and complete: at least quarterly, due 30 days after the end of the quarter
- **Invoicing (Sources: Grants Manual, eInvoicing web site, NGA General Provisions #18)**
 - Supporting Documentation Review and Timely
 - Timely and complete: at least quarterly, due 30 days after the end of the quarter



Quarterly Report Submission Schedule

Quarter	Reporting Period	Due No Later Than:
1 st Quarter	Oct 1 – Dec 31	January 30
2 nd Quarter	Jan 1 – Mar 31	April 30
3 rd Quarter	Apr 1 – Jun 30	July 30
4 th Quarter	Jul 1 – Sep 30	October 30
Final Report	Summarizes the last quarter of activity as well as the entire POP	90 calendar days after the expiration or termination of the award



SF-PPR Required Attachments

FMCSA Grant Programs	SF-PPR Required Attachment
Border Enforcement Grants (BEG); Commercial Driver License (CDL) Improvement Program; CDL Improvement System (CDLIS); CMV Operator Safety Training; Safety Data Improvement Program (SaDIP)	SF-PPR-B
MCSAP Basic and Incentive	MCSAP Formula Report
MCSAP High Priority (HP) and New Entrant Safety Audit (NE)	MCSAP Discretionary Report
Commercial Vehicle Information Systems Management (CVISN)	None
Performance and Registration Information Systems Management (PRISM)	SF-PPR-B_PRISM



PPR Q&A

- How to complete the narrative portion of a PPR
- What FMCSA is looking for
- How it may impact future awards
- Why FMCSA may reject a PPR



Monitoring - Amendment Requests

- Why needed – modification of activities, no-cost extension, budget modification
- Timely submittal – as soon as you know you need a change
- Content supportive with reasons to show the request is within scope, allowable, allocable, reasonable, and necessary.
- Cannot approve changes already made before the amendment was approved



National Program Review

- FMCSA is still working on our future steps
- FMCSA will follow-up on all the old outstanding findings
 - We have aggregated all open findings
 - Working on a website to track and close findings
 - FMCA will ask for State Partners to pilot this website in the next few months. If interested, we have a sign up sheet at the front



Wrap Up Questions ?



There are the 2 sections in the MCSAP Basic and /or **Discretionary** Program Monitoring Report
[Quarterly Report Required Content](#)

SECTION 1: EXECUTIVE SUMMARY-

1. **"The Grantee shall briefly describe the scope and purpose of the project."**

ZY DPS will conduct an estimated 1,000 inspections and 2,000 traffic enforcement contacts by allocating 3,000 officer-hours towards high visibility traffic enforcement activities during the period of March 1, 2015 through February 28, 2016.

2. **"This period's progress towards meeting the project's stated goals and/or objective as identified in the project's plan."**

ZY DPS is on track to meet our stated goals of 1,000 inspections and 2,000 traffic enforcement contacts. During the 1st Quarter of FY16, we completed 270 inspections, 525 traffic enforcement contacts and 750 officer hours have been dedicated. Our cumulative progress from our March 1, 2015 start is 870 inspections, 1720 traffic enforcement contacts and 2610 officer hours. [If you are not on track, explain why.](#)

3. **"How has this project contributed to reducing the incidence of large truck and bus fatalities and crashes?"**

Along these five high crash corridors, the State of ZY had 46 fatal crashes. From the project start date through the 1st Quarter of FY 16, we have 30 fatal crashes. [Data should be the most current available.](#)

4. **"Describe any deviation from the original project plan including actual/anticipated slippage in task completion dates, and special problems encountered or expected."**

If the project is being delayed for any reason you indicate why (e.g. weather delays, State emergencies, staffing issues, lack of resources). Continue communicating in each quarter of the project.

5. **"Projected Activities for the next Reporting Period"**

Provide a list of the planned activities for the next quarter (e.g. give dates of the next enforcement blitz, locations and or types of activities).

SECTION 2: PERFORMANCE PROGRESS - Description/instructions we provided on the performance reports:

ZY DPS has identified five highway corridors that alone account for 38.4% of all CMV-related fatalities in its State. State traffic records indicate that speeding, following too closely, and improper lane change account for 84% of the crash causation factors along these corridors.

ZY DPS will conduct activities around the highways in the five designated corridors of highway with the goal of reducing the crash rate along each by greater than 10% during the activity period as compared to the same time period last year.

1. The Grantee must monitor the program's performance and evaluate the progress during this reporting period.

Indicate the outcome of the project (first quarter will be a restatement from question two above). Evaluation will be an assessment of the activities to determine how effective they are thus far.

2. Include milestones and document the data source used for evaluation, as provided in your performance-based proposal.

Provide an update to the milestones listed in the approved plan and use the data sources that lead you to identifying the problem for evaluation. The first quarter evaluation may be merely anecdotal at this time.

3. Describe what activities were performed, and determine whether or not milestones and objectives are being met.

This is merely the project manager providing FMCSA an update with your progress to date and making sure you are performing the approved activities, meeting the listed milestones, and the stated objective. [If project has been delayed a quarter or more, you may need to create a new timeline and adjust benchmarks and milestones.](#)

4. Using baseline data and performance measures, the evaluator must assess the effectiveness of activities and strategies and make adjustments as appropriate.

Grantee has identified five highway corridors that alone account for 38.4% of all CMV-related fatalities in its State in FY14. The baseline is listed below followed by the project to date fatalities:

Corridor 1: FY 14 fatal crashes – 7; FY 15 - 3

Corridor 2: FY 14 fatal crashes - 6; FY 15 - 8

Corridor 3: FY 14 fatal crashes – 13; FY 15 - 8

Corridor 4: FY 14 fatal crashes – 8; FY 15 - 5

Corridor 5: FY 14 fatal crashes – 9; FY 15 - 6

An explanation for the high number of fatal crashes in Corridor 2 is in order:

What are your thoughts, conclusions?

Was there construction this year?

Was there worse weather than last year?

Did the road change (such as was a four lane highway, now a 2 lane highway with a bicycle lane and turn lane)?

The strategy for this activity may need to be adjusted as well based on your evaluation for this specific enforcement approach. E.g. if your strategy is to saturate one of the corridors between the hours of 8pm and 4am but after the first detail you determine this doesn't pay dividends, then tell the Division the change in plans for the next detail. Also, tell us if the stated activities aren't working and you would like to try new activities as long as they are already in the approved project. If you want to conduct an activity that is not in the approved project plan, you will need to submit an Amendment Request prior to performing the new activity. A portion of the **Amendment requirements is below:**

- A) A modification of activities includes, but is not limited, to: Sub-awarding, contracting or otherwise transferring out substantial programmatic work under the project plan. Note that the transfer of substantive work does not include the purchase of routine goods or services used in, or in support of, a project or program;
- B) Establishing new projects that are not a part of the original project plan but within the scope of the grant agreement;
- C) Joining separate projects into a single project; and
- D) Dividing a current project into two or more separate projects.

5. List each strategy/activity for each objective separately; add more or less as needed.

If you have multiple strategies and activities then you should evaluate them individually.

Federal Review

When the grantee provides the quarterly report as stated above, the federal evaluation task becomes more efficient and effective. If the quarterly report isn't completed accurately, then FMCSA must return the PPR to the grantee for revision.

In order to determine if the PPR meets minimum FMCSA requirements, **FMCSA provides this list of questions federal reviewers will answer at a minimum when reviewing quarterly PPRs.**

A) Is the project meeting the requirements and objectives of the program?

Overall the PPR is used to monitor how the state is meeting the requirements and objectives of the approved plan. If it isn't clear to the reviewer, than the FMCSA reviewer will reject the PPR and provide guidance when asking the grantee to revise.

For this example, if the grantee ceases inspections during the period of performance and this fact isn't explained in the PPR then FMCSA will reject the PPR and ask why.

B) Is the project accomplishing the specific objectives noted in the original application and/or the scope of work, if officially modified?

FMCSA staff monitors the PPR to ensure grantees are reporting back on the stated objectives in the approved plan and to ensure there isn't a change in scope. If there is any deviation from the objective or scope of work, the PPR will need to reflect why. If not adequately explained in the PPR, the PPR is rejected for further explanation and the Division may determine the project needs to be immediately put on hold until it is determined there is no change in scope.

The FMCSA for this example will reject the PPR if the state is not on track to meet their stated objective unless adequately explained: e.g. the first quarter numbers were impacted by multiple snow storms that required a shift to general traffic enforcement and motorist assists.

C) Is the project compliant with FMCSA requirements/guidelines for the program?

FMCSA utilizes the PPR as a tool to determine compliance with the grant terms and conditions. Late and incomplete PPRs may reflect negatively on a grantee's ability to manage future and current awards. Prior applicants past performance is a determining factor for future awards.

D) Is the project meeting its milestones?

If a project isn't meeting the milestones and the PPR isn't adequately addressing why, FMCSA will reject the PPR and ask for a revised PPR to allow the grantee to explain why.

E) Are the activities authorized by the currently approved budget?

If activities are different than the approved or amended project plan, FMCSA will reject the PPR and voucher so grantee may explain the reason for the change.